STIPULATION AND ORDER TO STAY CASE AN ADDITIONAL 45 DAYS

///

On or about August 6, 2024, good cause appearing and on stipulation of the parties, the Court stayed this action for ninety (90) days (until October 30, 2024) due to an ongoing criminal investigation into the shooting that underlies the basis for the action. ECF No. 16.

On or about October 31, 2024, the Court granted an additional stay for 60 days because the criminal investigation was still open, pending forensic reports from the California Department of Justice (DOJ) and a charging decision by the El Dorado County District Attorney's Office. ECF No. 18.

On or about December 4, 2024, the El Dorado County Sheriff's Office received the completed DOJ forensic reports. Using those reports, the El Dorado County Sheriff's Office was to conclude its investigation and forward it to the El Dorado County District Attorney's Office for review and a charging decision. Once the charging decision was issued, the El Dorado County Sheriff's Office was to release the incident material to Defendants in this case who was then to release such to Plaintiffs in this case. On January 31, 2025, the Court granted an additional stay for 60 days that ended on February 12, 2025. ECF No. 21.

On or about February 27, 2025, the Court granted an additional stay for 90 days, to end on May 27, 2025, because the criminal investigation was still open, pending the final approval stage and was expected to be turned over the District Attorney's Office in the next 3-4 weeks. The County was to transmit the incident material to Defendant's counsel as soon as the investigation concluded, who would then transmit such to Plaintiff's counsel. It was agreed Plaintiffs would need additional time to review such in order to evaluate how to proceed. ECF No. 23.

On or about April 4, 2025, Defendants provided an initial set of investigation materials comprising primarily of photographs and text documents. On or about April 22, 2025, Plaintiffs requested additional materials referenced in the initial set, and on or about April 28, 2025, Defendant provided a second set of investigation materials comprising of additional photographs, audio files, and video files. Plaintiffs require additional time to continue reviewing the voluminous amount of investigation materials provided thus far and evaluate how to proceed.

## Case 2:24-cv-01047-JAM-SCR Document 25 Filed 06/13/25 Page 3 of 4

1	Accordingly, the parties hereby stipulate to and request an additional stay of this action for	
2	forty-five (45) days (until July 25, 2025). The parties will file a joint status report at the conclusion	
3	of the stay and will re-notice hearing dates for any pending motions at that time should it be	
4	4 necessary.	
5	5 SO STIPULATED.	
6	6	
7	7 Dated: June 10, 2025	ANGELO, KILDAY & KILDUFF, LLP
8		/s/ Derick E. Konz (as authorized on 06/10/2025)
10	0	By:
11	1	DERICK E. KONZ JACOB J. GRAHAM
12	2	Attorneys for Defendants COUNTY OF
13	3	EL DORADO and JEFF LEIKAUF
14	4	
15	5	
16	6	
17	7 Dated: June 10, 2025	TIEMANN LAW FIRM
18	8	/s/ Peter B. Tiemann
19	9	By:
20	0	PETER B. TIEMANN JELENA TIEMANN
21	1	CARMEN D. OLMEDO ANDREW LEDEZMA
22	2	Attorneys for Plaintiffs
23	3	
24	4	
25	5	
26	6	
27	7	
28	8	

**ORDER** Good cause appearing and on stipulation of the parties, the Court hereby stays this action an additional forty-five (45) days (until July 25, 2025). All pending hearings and deadlines are VACATED. The parties will file a joint status report within fourteen days of the end of the stay and will re-notice any pending motions should it be necessary. IT SO ORDERED. Dated: June 12, 2025 /s/ John A. Mendez THE HONORABLE JOHN A. MENDEZ SENIOR UNITED STATES DISTRICT JUDGE